

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE NATIONAL SECURITY AGENCY  
TELECOMMUNICATIONS RECORDS  
LITIGATION

This Document Solely Relates To:

*Al-Haramain Islamic Foundation et al.*  
v. *Obama, et al.* (07-CV-109-VRW)

No. M:06-CV-01791-VRW

**STIPULATION TO EXTEND  
RESPONSE DATE IN  
ORDER OF APRIL 17, 2009  
[DKT. 84] AND ~~PROPOSED~~ ORDER**

[Civil L.R. 6-1(b); 6-2; 7-12]

Courtroom: 6, 17<sup>th</sup> Floor  
Judge: Hon. Vaughn R. Walker

Pursuant to Local Rule 6.1(b), the parties, through their undersigned counsel, hereby stipulate to an extension of the response date set forth in the Court's Order of April 17, 2009 (Dkt. 84 in 07-cv-109-VRW) from May 8, 2009 to May 15, 2009.

1. On April 17, 2009, the Court issued an order directing the parties to meet and confer regarding the entry of an appropriate protective order in this action concerning classified

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1 information and to either submit a stipulated order by May 8, 2009, or, if the parties are  
 2 unable to agree on all terms, to jointly submit a document containing all agreed terms together  
 3 with a document setting forth the terms about which they are unable to reach agreement and the  
 4 respective positions of the parties with regard to each such term. *See* Order, April 17, 2009 (Dkt.  
 5 84 in 07-cv-109-VRW).

6 2. Plaintiffs forwarded their proposed draft protective order to the Government  
 7 Defendants on April 24, 2009.

8 3. The Government Defendants require additional time to complete internal  
 9 deliberations on its position in response to the Court's Order, confer with the plaintiffs regarding  
 10 the Government's position, and prepare the Government's response under the Order.

11 4. In addition, the undersigned counsel for the Government (Mr. Coppolino) is  
 12 currently scheduled to be before the Court in San Francisco on May 7, 2009, for a hearing on a  
 13 separate matter in this MDL proceeding (the Government's motion for summary judgement in  
 14 actions concerning various state government investigations, *see* Dkt. 536 (Government's motion)  
 15 and Dkt. 574 (setting hearing for May 7, 2009) in MDL 06-cv-1791-VRW).

16 5. No prior modifications of the response date in the Court's April 17 Order have  
 17 been sought or entered. L.R. 6-2(a)(2).

18 6. The requested time modification would have no other impact on the schedule of  
 19 this case. L.R. 6-2(a)(3).

## 20 **STIPULATION**

21 Pursuant to L.R. 6.1(b), the parties, through their undersigned counsel, hereby stipulate  
 22 and agree to a one-week extension of the response date set by the Court in its April 17 Order  
 23 from May 8, 2009 to May 15, 2009.

24 DATED: April 30, 2009

Respectfully Submitted,

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 Acting Assistant Attorney General

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By: s/ Anthony J. Coppolino  
Anthony J. Coppolino

*Attorneys for the Government Defendants*

~~PROPOSED~~ ORDER

Pursuant to the foregoing Stipulation, and good cause appearing, the Court hereby orders that the response date set forth in the Court's Order of April 17, 2009 [Dkt. 84] shall be and hereby is extended to May 15, 2009.

**PURSUANT TO STIPULATION, IT IS SO ORDERED:**



Hon. Vaughn R. Walker  
United States District Chief Judge